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7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 MICHAEL CALKINS,

11 Plaintiff,

12 v.

13 PORTFOLIO RECOVERY ASSOCIATES,
LLC, a foreign limited liability company; and
14 EXPERIAN INFORMATION SERVICES,
INC.,

15 Defendants.

) Case No. 2:16-cv-02628-RFB-VCF

) **STIPULATION AND ORDER TO**
) **EXTEND TIME FOR DEFENDANT**
) **PORTFOLIO RECOVERY**
) **ASSOCIATES, LLC TO RESPOND TO**
) **PLAINTIFF MICHAEL CALKINS**
) **OPPOSITION TO MOTION FOR**
) **SUMMARY JUDGMENT**

16 **(FIRST REQUEST)**

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18 Pursuant to Local Rules IA 6-1, and IA 6-2, the parties, by and through their attorneys of
19 record hereby stipulate and request the court as follows:

20 1. This is the first stipulation for extension of time to allow Defendant Portfolio
21 Recovery Associates ("PRA") to respond to the Opposition to the Motion for Summary
22 Judgment filed by Plaintiff on December 5, 2017 (ECF No. 43).

23 2. The PRA's responsive pleading to the said Opposition to Motion for Summary
24 Judgment is due on December 19, 2017.

25 3. The parties agree to extend PRA's time to file a Response to Plaintiff's
26 Opposition to Motion for Summary Judgment in the above-caption matter from December 19,
27 2017 to January 5, 2018. Good cause exists for this request.
28

1 4. The extension is requested by PRA's counsel due to the fact counsel has been unable to
2 attend to and respond to Plaintiff's Opposition to Motion for Summary Judgment. This
3 stipulation is not made for purposes of delay.

4
5 Dated: this 18th day of December, 2017. KRAVITZ, SCHNITZER, & JOHNSON, CHTD.

6
7 By: /s/ Gina M. Mushmeche
8 Gina M. Mushmeche, Esq.
9 Nevada Bar No. 10411
10 8985 S. Eastern Ave., Suite 200
11 Las Vegas, NV 89123
12 *Attorneys for Defendant Portfolio Recovery*
13 *Associates, LLC*

14 Dated: this 18th day of December, 2017. NAYLOR & BRASTER

15 By: /s/ Jennifer L. Braster
16 Jennifer L. Braster, Esq.
17 Nevada Bar No. 9982
18 1050 Indigo Dr., Suite 200
19 Las Vegas, NV 89145
20 *Attorneys for Defendant Experian Information*
21 *Solutions*

22 Dated: this 18th day of December, 2017. THE LAW OFFICE OF VERNON NELSON,
23 PLLC

24 IT IS SO ORDERED:

25 

26 RICHARD F. BOULWARE, II
27 United States District Judge

28 DATED this 19th day of December, 2017.

By: /s/ Vernon Nelson
Vernon Nelson, Esq.
Nevada Bar No. 6434
9480 S. Eastern Ave., Suite 252
Las Vegas, NV 89123
Attorneys for Plaintiff Michael Calkins

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CERTIFICATE OF SERVICE

I hereby certify that on the 18th of December, 2017, I served a copy of the foregoing
STIPULATION AND ORDER TO EXTEND TIME FOR DEFENDANT PORTFOLIO
RECOVERY ASSOCIATES, LLC TO RESPOND TO PLAINTIFF MICHAEL CALKINS
OPPOSITION TO MOTION FOR SUMMARY (FIRST REQUEST) upon each of the
interested parties via electronic service through the United States District Court for the District of
Nevada's ECF system to the following:

Vernon A. Nelson, Jr., Esq.
The Law Office of Vernon Nelson
9480 S. Eastern Avenue, Suite 252
Las Vegas, Nevada 89123
Attorneys for Plaintiff

Jennifer L. Braster, Esq.
Naylor & Braster
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Las Vegas, Nevada 89145
Attorneys for Experian Information Solutions

By /s/ Annette Cooper
An Employee of Kravitz, Schnitzer, Johnson, CHTD.